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MEMORANDUM

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TO: Docket Control

FROM: Steven M. Olea  
Director  
Utilities Division

DATE: December 2, 2014

ORIGINAL

RE: IN THE MATTER OF THE APPLICATION OF GC PIVOTAL, LLC FOR A  
CERTIFICATE OF CONVENIENCE AND NECESSITY TO PROVIDE  
FACILITIES-BASED AND RESOLD LOCAL EXCHANGE AND  
INTEREXCHANGE TELECOMMUNICATIONS SERVICES AND  
FACILITIES-BASED PRIVATE LINE SERVICE IN ARIZONA (DOCKET  
NO. T-20787A-14-0367)

Attached is the Staff Report for the above Application requesting approval for a Certificate of Convenience and Necessity ("CC&N") to provide the following services:

- Resold Local Exchange Telecommunications Services
- Resold Long Distance Telecommunications Services
- Facilities-Based Local Exchange Telecommunications Services
- Facilities-Based Long Distance Telecommunications Services
- Facilities-Based Private Line Telecommunications Services

Staff is recommending approval of the Application with conditions.

SMO:MAC:red\BH

Originator: Matt Connolly

Attachment: Original and Thirteen copies

Arizona Corporation Commission

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DOCKET NO. T-20787A-14-0367

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**STAFF REPORT**  
**UTILITIES DIVISION**  
**ARIZONA CORPORATION COMMISSION**

**GC PIVOTAL, LLC**  
**DOCKET NO. T-20787A-14-0367**

**IN THE MATTER OF THE APPLICATION OF GC PIVOTAL, LLC FOR A  
CERTIFICATE OF CONVENIENCE AND NECESSITY TO PROVIDE FACILITIES-  
BASED AND RESOLD LOCAL EXCHANGE AND INTEREXCHANGE  
TELECOMMUNICATIONS SERVICES AND FACILITIES-BASED PRIVATE LINE  
SERVICE IN ARIZONA**

**DECEMBER 2, 2014**

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## STAFF ACKNOWLEDGMENT

The Staff Report for GC Pivotal, LLC, Docket No. T-20787A-14-0367 was the responsibility of the Staff member listed below. Matt Connolly was responsible for the review and analysis of the GC Pivotal, LLC Application for a Certificate of Convenience and Necessity to provide Resold and Facilities-Based Local Exchange, Resold and Facilities-Based Long Distance and Facilities-Based Private Line Telecommunications Services within the State of Arizona, in addition to the petition for a determination that its proposed services should be classified as competitive.

A handwritten signature in black ink, appearing to read 'Matt Connolly', is written over a horizontal line.

Matt Connolly  
Executive Consultant II

## **1. INTRODUCTION**

On October 9, 2014, GC Pivotal, LLC dba Global Capacity ("GC Pivotal" or "Applicant") filed an Application for a Certificate of Convenience and Necessity ("CC&N") to provide resold and facilities-based local exchange, resold and facilities-based interexchange and facilities-based private line telecommunications services within the State of Arizona. The Applicant also petitioned the Arizona Corporation Commission ("Commission") for a determination that its proposed services should be classified as competitive.

GC Pivotal currently holds authority to provide resold private line service in Arizona pursuant to Decision No. 73645 dated February 6, 2013. GC Pivotal filed this Application in conjunction with a Notification of Transfer of Customers and Assets from Megapath Corporation ("Megapath") dated October 7, 2014 in Docket Nos. T-20787A-14-0368 and T-03632A-14-0368. As part of this transaction with Megapath, the Megapath interconnection agreement with the Incumbent Local Exchange Carrier ("ILEC") will be transferred to GC Pivotal. The Applicant stated that given the transfer, GC Pivotal is seeking the same authority in Arizona currently held by Megapath to ensure the transfer of Megapath customers and interconnection arrangements occur without issue.

GC Pivotal's October 9, 2014 Application did not include a proposed tariff for the services it is requesting the authority to provide. Instead, the Applicant stated that it will provide service to its facilities-based and resold customers under the private line tariffed rates, terms and conditions currently on file with the Commission. All of the customers involved in the transfer from Megapath to GC Pivotal will continue to receive service from GC Pivotal under the same rates, terms and conditions of service as were previously provided by Megapath.

On October 21, 2014, Staff issued its First Set of Data Requests to GC Pivotal. Responses to Staff's First Set of Data Requests were received from the Applicant on October 28, 2014. On October 29, 2014, Staff issued its Second Set of Data Requests. Responses to Staff's Second Set of Data Requests were received from GC Pivotal on November 5, 2014.

Staff's review of this Application addresses the overall fitness of the Applicant to receive a CC&N. Staff's analysis also considers whether the Applicant's services should be classified as competitive and if the Applicant's initial rates are just and reasonable.

## **2. TECHNICAL CAPABILITY TO PROVIDE THE REQUESTED SERVICES**

GC Pivotal, formed on May 20, 2010, is a foreign limited liability corporation organized under the laws of the State of Delaware. GC Pivotal's headquarters is located at 180 North LaSalle Street, Suite 2430, Chicago, Illinois, 60601. GC Pivotal is wholly owned by Pivotal Global Capacity LLC, an Arizona limited liability company, which in turn is wholly owned by FFN Investments, LLC, also an Arizona limited liability company.

GC Pivotal currently has authority to provide private line, access, resold or facilities-based local exchange and/or interexchange services in forty-four (44) jurisdictions in addition to Arizona

(see Attachment A). In addition to Arizona, GC Pivotal is seeking either authority or expanded authority in ten (10) jurisdictions (see Attachment B).

The officers and management team of GC Pivotal have a combined fifty-three (53) years experience in the telecommunications industry. GC Pivotal has two Network Operations Centers located in Chicago, Illinois and Waltham, Massachusetts it utilizes to provide customer service and respond to requests for maintenance and repair. The Network Operations Centers can be contacted via the toll free number of 1-866-469-5667 or via the email at CNO@globalcapacity.com.

GC Pivotal will have four employees located in Arizona providing field technician services. If a maintenance and repair issue arises pertaining to customer premise equipment owned by GC Pivotal, then that issue will be handled by either an employee or sub-contractor of GC Pivotal. If a maintenance and repair issue arises pertaining to leased network or facility assets, GC Pivotal will work with service or repair technicians for the owner or operator of the leased network or facility assets.

Customer complaints will be handled internally through the Applicant's customer service department. GC Pivotal will create a toll free number for customers to call regarding complaints. In addition, customers may contact GC Pivotal via email at customercare@globalcapacity.com.

GC Pivotal intends to offer private line services. In response to Staff's Data Request STF 1.15, GC Pivotal indicated that in order to provide facilities-based service it will be purchasing Megapath's network which is composed of equipment in collocation spaces (e.g., Digital Subscriber Line Access Multiplexers ("DSLAM"), routers, cable and racks), and applications used to provide service and equipment related to Megapath's points of presence and transport. The network consist of assets largely collocated in ILEC central offices. Security of the Applicant's equipment will be ensured by adherence to the colocation-based facilities' security guidelines and procedures. GC Pivotal will also be interconnecting with ILEC networks as needed to provide services to customers.

Based on the above information, Staff believes GC Pivotal possesses the technical capabilities to provide the services it is requesting the authority to provide in Arizona.

### **3. FINANCIAL CAPABILITY TO PROVIDE THE REQUESTED SERVICES**

A Protective Agreement was signed prior to the Applicant providing its financial statements. On October 21, 2014, GC Pivotal provided audited consolidated financial statements for 2012 and 2013 which included financial information for itself and a subsidiary.<sup>1</sup> The financial statements for year ending December 31, 2012, lists total assets of \$31,845,970; total equity of \$23,977,999 and net income of negative \$3,213,221. The financial statements for year ending December 31, 2013, lists total assets of \$30,777,249; total equity of \$20,233,353 and net income of negative \$3,713,213. The Applicant also provided notes to its financial statements.

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<sup>1</sup> The subsidiary is Magenta netLogic, Ltd./Global Capacity Ltd., which includes GC Pivotal's Manchester, UK-based group of cloud application programmers. Magenta netLogic, Ltd./Global Capacity Limited does not sell telecommunications services. This subsidiary accounts for less than (one percent) 1% of the submitted financial data.

#### **4. ESTABLISHING RATES AND CHARGES**

The Applicant would initially be providing service in areas where an ILEC, along with various competitive local exchange carriers ("CLEC") and interexchange carriers ("IXC") are providing telephone service. Therefore, the Applicant would have to compete with those providers in order to obtain subscribers to its services. The Applicant would be a new entrant and would face competition from both an incumbent provider and other competitive providers in offering service to its potential customers. Therefore, the Applicant would generally not be able to exert market power. Thus, the competitive process should result in rates that are just and reasonable.

Both an initial rate (the actual rate to be charged) and a maximum rate must be listed for each competitive service offered, provided that the rate for the service is not less than GC Pivotal's total service long-run incremental cost of providing the service pursuant to A.A.C. R14-2-1109.

The rates proposed by this filing are for competitive services. In general, rates for competitive services are not set according to rate of return regulation. The Applicant indicated that at the end of the first twelve months of operation the net book value of all Arizona assets that could be used in the provision of telecommunications service to Arizona customers will be \$5 to 7 million.

The rate to be ultimately charged by the Applicant will be heavily influenced by the market. Therefore, while Staff considered the fair value rate base information submitted by the Applicant, the fair value rate base information provided should not be given substantial weight in this analysis.

#### **5. LOCAL EXCHANGE CARRIER SPECIFIC ISSUES**

Issues related to the provision of Local Exchange service are discussed below.

##### *5.1 Number Portability*

The Commission has adopted rules to address number portability in a competitive telecommunications services market. Local exchange competition may not be vigorous if customers, especially business customers, must change their telephone numbers to take advantage of a competitive local exchange carrier's service offerings. Consistent with federal laws, federal rules and A.A.C. R14-2-1308(A), the Applicant shall make number portability available to facilitate the ability of a customer to switch between authorized local carriers within a given wire center without changing their telephone number and without impairment to quality, functionality, reliability or convenience of use.

##### *5.2 Provision Of Basic Telephone Service And Universal Service*

The Commission has adopted rules to address universal telephone service in Arizona. Arizona Administrative Code ("A.A.C.") R14-2-1204(A) indicates that all telecommunications service providers that interconnect into the public switched network shall provide funding for the Arizona Universal Service Fund ("AUSF"). The Applicant will make the necessary monthly payments required by A.A.C. R14-2-1204(B).



### *5.3 Quality Of Service*

In the competitive market that the Applicant wishes to enter, the Applicant generally will have no market power and will be forced to provide a satisfactory level of service or risk losing its customers. Therefore, Staff believes that the Applicant should be ordered to abide by the same quality of service standards that were approved by the Commission for Qwest dba CenturyLink QC ("CenturyLink") in Docket No. T-01051B-13-0199 (Decision No. 74208).

### *5.4 Access To Alternative Local Exchange Service Providers*

Staff expects that there will be new entrant providers of local exchange service who will install the plant necessary to provide telephone service to, for example, a residential subdivision or an industrial park much like existing local exchange companies do today. There may be areas where the Applicant installs the only local exchange service facilities. In the interest of providing competitive alternatives to the Applicant's local exchange service customers, Staff recommends that the Applicant be prohibited from barring access to alternative local exchange service providers who wish to serve such areas. This way, an alternative local exchange service provider may serve a customer if the customer so desires. Access to other providers should be provided pursuant to the provisions of the 1996 Telecommunications Act, the rules promulgated there under and Commission rules on interconnection and unbundling.

### *5.5 911 Service*

The Commission has adopted rules to address 911 and E911 services in a competitive telecommunications services market. The Applicant has stated that upon providing voice local exchange service, in accordance with A.A.C. R14-2-1201(6)(d) and Federal Communications Commission ("FCC") 47 CFR Sections 64.3001 and 64.3002, it will provide all customers with 911 and E911 service, where available, or will coordinate with ILECs and emergency service providers to provide 911 and E911 service.

### *5.6 Custom Local Area Signaling Services*

Consistent with past Commission decisions, the Applicant may offer Caller ID provided that per call and line blocking, with the capability to toggle between blocking and unblocking the transmission of the telephone number, are provided as options to which customers could subscribe with no charge. Also, Last Call Return service that will not return calls to telephone numbers that have the privacy indicator activated, indicating that the number has been blocked, must be offered.

## **6. REVIEW OF COMPLAINT INFORMATION**

In its Application, the Applicant states that it has not had an Application for authority to provide service denied in any state or jurisdiction. The Applicant indicated that none of its officers, directors or partners have been or are currently involved in any civil or criminal investigation or been convicted of any criminal acts within the past ten (10) years.

In its Application, GC Pivotal noted that in 2013, the regulatory staff of the Nevada Public Utilities Commission issued a petition for a show cause order against GC Pivotal due to an incomplete annual report filing for calendar year 2012, in Nevada Public Utility Commission ("PUC") Docket No. 13-08019, and GC Pivotal was ultimately fined (fifty) \$50. Staff's research regarding this issue found that the fine was actually due to a late filed error correction and that GC Pivotal paid the compliance fine in a timely manner as ordered.

GC Pivotal also noted that in 2013, the Staff of the Public Service Commission of West Virginia filed a Joint Staff Memorandum stating that GC Pivotal failed to commence operations within one year after receiving its certificate of authority and that such authority should therefore be revoked. GC Pivotal stated the matter had been closed after GC Pivotal had explained to the Public Service Commission of West Virginia that it had taken longer to commence operations than originally planned. Staff's research regarding this issue found that GC Pivotal had begun operations approximately six (6) months later than ordered but the matter had indeed been closed with no revocation of authority.

Staff contacted the PUCs in eight jurisdictions in to determine if GC Pivotal is certificated or registered to provide telecommunications services in the jurisdictions listed by the Applicant.<sup>2</sup> Staff also inquired whether there were any consumer complaints filed against the Applicant. The information Staff obtained indicates that GC Pivotal is authorized to provide telecommunications services in the sampled states and no complaints have been filed.

The Compliance Section of the Utilities Division reports that GC Pivotal is currently in compliance. The Consumer Services Section of the Utilities Division reports that there have been no complaints, inquiries, or opinions filed against GC Pivotal from January 1, 2011 to October 20, 2014. Consumer Services also reports that GC Pivotal is in Good Standing with the Corporations Division of the Commission. Further, a search of the FCC website found that there have been no complaints filed against GC Pivotal.

## **7. COMPETITIVE SERVICES ANALYSIS**

The Applicant has petitioned the Commission for a determination that the services it is seeking to provide should be classified as competitive.

### *7.1 Competitive Services Analysis For Local Exchange Services*

#### **7.1.1 A description of the general economic conditions that exist, which make the relevant market for the service one that is competitive.**

The statewide local exchange market that the Applicant seeks to enter is one in which a number of CLECs have been authorized to provide local exchange service in areas previously served only by ILECs. At locations where ILECs provide local exchange service, the Applicant will be entering the market as an alternative provider

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<sup>2</sup> Arkansas, Hawaii, Nevada, Oklahoma, Oregon, Texas, Vermont and Virginia.

of local exchange service and, as such, will have to compete with those existing companies in order to obtain customers. In areas where ILECs do not serve customers, the Applicant may have to convince developers to allow it to provide service to their developments. The areas served by CenturyLink that the Applicant seeks to enter are served by wireless carriers and Voice over the Internet Protocol ("VoIP") service providers. This may also be the case in areas served by independent ILECs.

**7.1.2 The number of alternative providers of the service.**

CenturyLink and various independent ILECs provide local exchange service in the State. CLECs and local exchange resellers are also providing local exchange service. The areas served by CenturyLink that the Applicant seeks to enter are served by wireless carriers and VoIP service providers. This may also be the case in portions of the independent ILECs' service territories.

**7.1.3 The estimated market share held by each alternative provider of the service.**

CenturyLink and CLECs are the primary providers of local exchange service in CenturyLink's Service territories. Independent ILECs are the primary providers of local exchange service in their service territories.

**7.1.4 The names and addresses of any alternative providers of the service that are also affiliates of the telecommunications Applicant, as defined in A.A.C. R14-2-801.**

GC Pivotal does not have any affiliates that are alternative providers of local exchange service in Arizona.

**7.1.5 The ability of alternative providers to make functionally equivalent or substitute services readily available at competitive rates, terms and conditions.**

ILECs have the ability to offer the same services that the Applicant has requested the authority to provide in their respective service territories. Similarly, many of the CLECs, local exchange service resellers, wireless carriers and VoIP service providers also offer substantially the same services.

**7.1.6 Other indicators of market power, which may include growth and shifts in market share, ease of entry and exit, and any affiliation between and among alternative providers of the service(s).**

The local exchange service market is:

- a. One in which ILECs own networks that reach nearly every residence and business in their service territories. Competition exists in most urban markets, but to a lesser degree in rural areas of the state.
- b. One in which new entrants will be dependent upon ILECs and other CLECs:
  1. To terminate traffic to customers.
  2. To provide essential local exchange service elements until the entrant's own network has been built.
  3. For interconnection.
- c. One in which existing ILECs and CLECs have had an existing relationship with their customers that the Applicant will have to overcome if it wants to compete in the market and one in which the Applicant will not have a history in the Arizona local exchange service market.
- d. One in which the Applicant will not have the capability to adversely affect prices or restrict output to the detriment of telephone service subscribers.

## *7.2 Competitive Services Analysis For Interexchange Services*

### **7.2.1 A description of the general economic conditions that exist, which makes the relevant market for the service one that is competitive.**

The statewide interexchange market that the Applicant seeks to enter is one in which numerous facilities-based interexchange carriers and resellers of interexchange service have been authorized to provide service throughout the State. The market the Applicant seeks to enter is also served by wireless carriers and VoIP providers. The Applicant will be a new entrant in this market and, as such, will have to compete with those existing companies in order to obtain customers.

### **7.2.2 The number of alternative providers of the service.**

There are a large number of facilities-based interexchange carriers and resellers providing interexchange service throughout the State. The market the Applicant seeks to enter is also served by wireless carriers and VoIP service providers.

### **7.2.3 The estimated market share held by each alternative provider of the service.**

Facilities-based interexchange carriers, interexchange service resellers, independent ILECs, CLECs, wireless carriers and VoIP providers all hold a portion of the interexchange market.

**7.2.4 The names and addresses of any alternative providers of the service that are also affiliates of the telecommunications Applicant, as defined in A.A.C. R14-2-801.**

GC Pivotal does not have any affiliates that are alternative providers of interexchange service in Arizona.

**7.2.5 The ability of alternative providers to make functionally equivalent or substitute services readily available at competitive rates, terms and conditions.**

Both facilities-based interexchange carriers and interexchange service resellers have the ability to offer the same services that the Applicant has requested in their respective service territories. Similarly, many of the ILECs and CLECs offer similar interexchange services. The market the Applicant seeks to enter is also served by wireless carriers and VoIP service providers.

**7.2.6 Other indicators of market power which may include growth and shifts in market share, ease of entry and exit, and any affiliation between and among alternative providers of the service(s).**

The interexchange service market is:

- a. One with numerous competitors and limited barriers to entry.
- b. One in which established interexchange carriers have had an existing relationship with their customers that the new entrants will have to overcome if they want to compete in the market.
- c. One in which the Applicant will not have the capability to adversely affect prices or restrict output to the detriment of telephone service subscribers.
- d. One in which the share of the market held by wireless carriers has increased over time, while that held by wireline carriers has declined.

*7.3 Competitive Services Analysis For Private Line Services*

**7.3.1 Private Line Services**

Private line service is a direct circuit or channel specifically dedicated to the use of an end user organization for the purpose of directly connecting two or more sites in a multi-site enterprise. Private line service provides a means by which customers may transmit and receive messages and data among various customer locations over facilities operated and provided by the Applicant.

**7.3.2 Description of Requested Services**

GC Pivotal proposes to provide private line service. Private line service is a direct circuit or channel specifically dedicated to the use of an end user organization for the purpose of directly connecting two or more sites in a multi-site enterprise.

**7.3.3 A description of the general economic conditions that exist that make the relevant market for the service one that is competitive.**

IXCs hold a substantial share of the private line service market. Also, a number of ILECs and CLECs have been authorized to provide private line service. The Applicant will be entering the market as an alternative provider of private line service and, as such, the Applicant will have to compete with several existing companies in order to obtain customers.

**7.3.4 The number of alternative providers of the service.**

IXCs are providers of private line service in the State of Arizona. In addition, ILECs and CLECs also provide private line service.

**7.3.5 The estimated market share held by each alternative provider of the service.**

IXCs and ILECs hold a substantial share of the private line market. CLECs likely have a smaller share of the private line market.

**7.3.6 The names and addresses of any alternative providers of the service that are also affiliates of the telecommunications Applicant, as defined in A.A.C. R14-2-801.**

None.

**7.3.7 The ability of alternative providers to make functionally equivalent or substitute services readily available at competitive rates, terms and conditions.**

IXCs and ILECs have the ability to offer the same services that the Applicant has requested in their respective service territories. Similarly, many of the CLECs offer substantially similar services.

**8. RECOMMENDATIONS**

The following sections contain Staff recommendations on the Application for a CC&N and the Applicant's petition for a Commission determination that its proposed services should be classified as competitive.

*8.1 Recommendations On The Application For A CC&N*

Staff recommends that Applicant's Application for a CC&N to provide intrastate telecommunications services, as listed in this Report, be approved. In addition, Staff further recommends:

1. That the Applicant comply with all Commission Rules, Orders and other requirements relevant to the provision of intrastate telecommunications services;
2. That the Applicant abide by the quality of service standards that were approved by the Commission for Qwest dba CenturyLink QC in Docket No. T-01051B-13-0199;
3. That the Applicant be prohibited from barring access to alternative local exchange service providers who wish to serve areas where the Applicant is the only provider of local exchange service facilities;
4. That the Applicant be required to notify the Commission immediately upon changes to the Applicant's name, address or telephone number;
5. That the Applicant cooperate with Commission investigations including, but not limited to customer complaints;
6. The rates proposed by this filing are for competitive services. In general, rates for competitive services are not set according to rate of return regulation. The Applicant indicated that at the end of the first twelve months of operation the net book value of all Arizona assets that could be used in the provision of telecommunications service to Arizona customers will be \$5 to 7 million. The rate to be ultimately charged by the Applicant will be heavily influenced by the market. Therefore, while Staff considered the fair value rate base information submitted by GC Pivotal, the fair value information provided was not given substantial weight in this analysis;
7. That the Applicant offer Caller ID with the capability to toggle between blocking and unblocking the transmission of the telephone number at no charge;
8. That the Applicant offer Last Call Return service that will not return calls to telephone numbers that have the privacy indicator activated; and
9. That the Commission authorize the Applicant to discount its rates and service charges to the marginal cost of providing the services.

Staff further recommends that the Applicant be ordered to comply with the following. If it does not do so, the Applicant's CC&N shall be null and void after due process.

1. If the Applicant does not provide local exchange service to end users within (3) three years from the date of the Order in this docket, that the Applicant be required to

notify the Commission of this fact and to request cancellation of its CC&N through a filing made in this docket.

2. The Applicant shall notify the Commission through a compliance filing within (30) thirty days of the commencement of service to its first end-user customer.
3. The Applicant file a tariff update within (30) thirty days from the date of the Order in this docket indicating the toll free number for customer complaints.
4. The Applicant shall abide by the Commission adopted rules that address Universal Service in Arizona. A.A.C. R14-2-1204(A) indicates that all telecommunications service providers that interconnect into the public switched network shall provide funding for the Arizona Universal Service Fund ("AUSF"). The Applicant will make the necessary monthly payments required by A.A.C. R14-2-1204(B).

#### *8.2 Recommendation On The Applicant's Petition To Have Its Proposed Services Classified As Competitive*

Staff believes that the Applicant's proposed services should be classified as competitive. There are alternatives to the Applicant's services. The Applicant will have to convince customers to purchase its services, and the Applicant has no ability to adversely affect the local exchange or long distance service markets. Therefore, the Applicant currently has no market power in the local exchange service market where alternative providers of telecommunications services exist. Staff therefore recommends that the Applicant's proposed services be classified as competitive.



## Attachment A

The following are the jurisdictions in which GC Pivotal is currently authorized to provide telecommunications services:

1. Alabama
2. Arkansas
3. California
4. Connecticut
5. Delaware
6. District of Columbia
7. Florida
8. Georgia
9. Hawaii
10. Idaho
11. Illinois
12. Indiana
13. Iowa
14. Kansas
15. Kentucky
16. Louisiana
17. Maine
18. Maryland
19. Massachusetts
20. Michigan
21. Minnesota
22. Mississippi
23. Missouri
24. Montana
25. Nevada
26. New Hampshire
27. New Mexico
28. New York
29. North Carolina
30. North Dakota
31. Ohio
32. Oklahoma
33. Oregon
34. Pennsylvania
35. Rhode Island
36. South Carolina
37. South Dakota
38. Texas
39. Utah
40. Vermont
41. Virginia
42. West Virginia
43. Wisconsin
44. Wyoming

## Attachment B

The following are the jurisdictions in which GC Pivotal is currently seeking authority or expanded authority to provide telecommunications services:

1. Alabama
2. Colorado
3. Florida
4. Georgia
5. Idaho
6. Nebraska
7. New Jersey
8. Tennessee
9. Washington
10. Wyoming